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September 7, 2017

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by Kathryn Ross
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Kathryn Ross

BY FACSIMILE AND EMAIL

Jeff S. Jordan
Assistant General Counsel
Complaints Examination and Legal Administration
Federal Election Commission
Attn: Kathryn Ross, Paralegal
999 E Street, NW
Washington, DC 20463
CELA@fec.gov

RE: MUR 7272 – Congressman Dana Rohrabacher, Committee to Re-Elect Congressman
Dana Rohrabacher, and Jen Slater, Treasurer

Dear Mr. Jordan & Ms. Ross:

The undersigned, per three Designations of Counsel attached hereto, represents Congressman Dana Rohrabacher, his principal committee, the Committee to Re-Elect Congressman Dana Rohrabacher, and Jen Slater, Treasurer of the committee. This is our response to the Complaint filed on August 14, 2017 with the commission and designated MUR 7272 against these Respondents and a number of other federal officials, individuals and organizations.

We respectfully request that the Commission take no further action in the matter.

There is no merit to these wholly speculative and unsubstantiated allegations against Congressman Rohrabacher, his committee and the committee treasurer. Further, the allegations are unsupported by appropriate verification under penalty of perjury by the chief complainant, attorney J. Whitfield Larrabee, and the complaint contains blanket, conclusory allegations on information and belief by Mr. Thomas Giles, purporting to complain against these Respondents. The summary of the speculative allegations against my clients is that they accepted, received and retained campaign contributions which they knew were made by foreign nationals in the names of lobbyists and foreign agents, who allegedly were lobbying on matters before the House Foreign Affairs Committee. 52 USCA 30121 (count 2) and knowingly and willfully accepted and retained contributions made on behalf of foreign nationals via 'straw donors' (30122 and count 3) (Compl. ¶ 2.) Punctuated by phrases like "it would not be surprising" (¶ 41), "was very likely funded" and "could not have occurred without" (¶ 42), "according to the DNC" and "the DNC has asserted that" (¶ 44), they assert things of which they have no actual or informational knowledge (e.g. that Rohrabacher "knew" that certain individuals were acting on behalf of foreign nationals) (¶ 48). Moreover, they assert that three individuals (former Congressman Vin Weber, Paul A. Manafort, Jr. and Edward Kutler) made contributions on behalf of a Respondent

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(ECFMU), and that my clients retained such contributions "long after they knew" the contributions "appeared to have been made" were made on behalf of foreign principals in violation of 30121 (¶¶ 81 & 89) that are speculative and unsupported on their face.

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Apart from the pure speculation as to my clients' knowledge and intentions in the complaint, the complainants have no, concrete, factual information to support their speculations against Congressman Rohrabacher and his committee. Moreover, there is simply no foundational factual information to support any such claims against the committee's treasurer, Ms. Slater, who assumed her position in 2015, after the actions alleged to have violated the law. The undersigned does not represent Mr. Jack Wu, a former Committee treasurer, whom the Commission is aware was terminated for cause in 2015. However, my clients have no reason to believe Mr. Wu has knowledge of any facts that would support such allegations or that he would have any different answers than theirs.

Finally, the Respondents have no information in their possession that would shed any light on the claims made, and a cursory review of the complaint makes clear why they should not be put to proving a negative to rebut these purely "made-for- media publicity" claims.

In conclusion, these allegations do not establish an actionable complaint, much less anything like any reason to believe that violations of the Act have occurred.

On their behalf, I request again that no further action be taken.

Very truly yours,



Charles H. Bell, Jr.
Designated Counsel



FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

FAX 202-219-3923

MUR # 7272

Name of Counsel: Charles H Bell, Jr.

Firm: Bell, McAndrews & Hiltachk, LLP

Address: 455 Capitol Mall, Suite 600
Sacramento, CA 95814

Telephone: 916.442.7757 Fax: 916.442.7759

E-mail: cbell@bmhlaw.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9/6/17 [Signature] Campaign Manager
Date Signature (Respondent/Agent) Title

RESPONDENT: Representative Dana T. Rohrabacher
(Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 9070 Irvine Center Drive #150
(Please Print) Irvine, CA 92618

Telephone (H): _____ (w): 949.858.7448

E-mail: jeneve@campaign-compliance.com

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.



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9/6/17
Date

[Signature]
Signature (Respondent/Agent)

Treasurer
Title

RESPONDENT: Committee to Re-Elect Congressman Dana Rohrabacher
(Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 9070 Irvine Center Drive #150
(Please Print) Irvine, CA 92618

Telephone (H): _____ (W): 949.858.7448

E-mail: jenere@Campaign-Compliance.com

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Sacramento, CA 95814

Telephone: 916. 442. 7757 Fax: 916. 442. 7759

E-mail: cbell@bmhlaw.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission:

9/6/17
Date

Jen Slater
Signature (Respondent/Agent)

Treasurer
Title

RESPONDENT: Jen Slater
(Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 9070 Irvine Center Drive #50
(Please Print)

Irvine, CA 92618

Telephone (H): _____ (W): 949. 858. 7448

E-mail: Jenene.C.Campaign-Compliance.com

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